

## UNITED STATES DISTRICT COURT

for the

Western District of Oklahoma

United States of America

v.

Oscar Reynaldo Gomez,

Case No. M-23- 258-SM

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 17, 2023 in the county of Oklahoma in the  
Western District of Oklahoma, the defendant(s) violated:

Code Section

18 U.S.C. § 844(i)

Offense Description

Arson

This criminal complaint is based on these facts:

See attached Affidavit of Special Agent, Chad Oubre, ATF, which is incorporated and made a part hereof by reference.

☒ Continued on the attached sheet.


Complainant's signature

Chad Oubre, Special Agent, ATF

Printed name and title

Sworn to before me and signed in my presence.

Date: April 23, 2023


Judge's signature

City and state: Oklahoma City, Oklahoma

SUZANNE MITCHELL, U.S. Magistrate Judge

Printed name and title

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF OKLAHOMA**

**STATE OF OKLAHOMA                    )**  
**)**  
**COUNTY OF OKLAHOMA                )**

**AFFIDAVIT OF PROBABLE CAUSE.**  
**IN SUPPORT OF ARREST WARRANT**

# AFFIDAVIT

I, Chad R. Oubre, being duly sworn, do hereby state that I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), a Division of the United States Department of Justice, having been so employed since December 2009. I am a graduate of the Department of Homeland Security's Criminal Investigator Training program as well as the ATF Special Agent Basic Training Program. As a Special Agent with ATF, I am vested with the authority to investigate violations of Federal laws including Title 18 of the United States Code.


I have been assigned to the ATF Oklahoma City Field Office since July 2010. I am familiar with the information contained in this affidavit through personal investigation and/or information received from other law enforcement officers, mentioned herein, who have participated in and/or have contributed documentary reports of their investigative efforts in this matter. This affidavit contains information necessary to support the Complaint and is not intended to include every fact, or matter observed or known by me.

### PROBABLE CAUSE


1. On April 17, 2023, at approximately 5:14 am the Oklahoma City Fire Department (OCFD) was dispatched to a commercial structure fire at 7200 S. Walker, Oklahoma City, Oklahoma (within the Western District of Oklahoma), a house of worship identified as the God of No Limits Church. Upon arrival of first fire crews, fire was coming from the northwest door and the roof on the north side of the structure. The fire caused significant damage, including extensive damage to the roof of the building.
2. Rebecca Guerra, an employee of a business located at 7370 S. Walker was interviewed and Ms. Guerra stated that she arrived at work at approximately 5:00 am and did not notice any smoke or fire at 7200 S. Walker. She retrieved a vehicle from the onsite garage and then noticed heavy smoke and fire from a vent on the south roof of 7200 S. Walker. Ms. Guerra took a photograph and called 911 to report the fire.

3. The pastor of the God of No Limits Church (GONL), Marty Alvarado, was also interviewed multiple times throughout the incident. In summary, Alvarado stated that the God of No Limits Church is an International Pentecostal Holiness Church (IPHC) with approximately 120 members. GONL pays a required payment of approximately \$800.00 per month to IPHC, in exchange for access to and support from the IPHC. In addition, there is a school operated out of the church in which the students pay the church a fee to attend.
4. On April 22, 2023, ATF Special Agent Oubre reviewed details regarding the IPHC via the official IPHC website, located at <https://iphc.org/introduction/>. According to the website, though the IPHC is headquartered in Oklahoma City, it is an organization with 1,600 congregations across the United States and a total estimated membership of over 1.5 million.
5. During the investigation, two digital video recorders (DVR) were recovered inside the structure. The DVRs were sent to the Oklahoma City Police Department for forensic analysis. On April 18, 2023, portions of video were recovered from surveillance cameras inside the structure.
6. The footage was reviewed and showed a male wearing a hooded zip up sweatshirt, shorts and work type boots, broke the glass on the northwest door of the church. The male entered the church and used what appeared to be a lighter to ignite material inside the church. After ignition, the individual moved the burning material out of view of the camera. A short time after, the person left through the northwest doors the same way he entered. The footage then showed a reflection on the north wall of the hallway and a flickering light begin to grow, then smoke filled the hallway and the footage ended.
7. Investigators were able to obtain surveillance footage from other cameras in the area. Footage was obtained from a nearby 7-11 which showed that at approximately 4:49am, an individual matching the description of the suspected arsonist to have purchased a cigarette lighter.
8. The person got on a white bicycle and traveled toward the church. Additional cameras showed an individual matching the description and riding a bicycle approach the church and walk around the south side of the building then to the west side (which was where the northwest doors were located) at 5:04am.
9. Upon further investigation, the person in the video footage from 7-11 was identified by law enforcement as Oscar GOMEZ. Specifically, the officers showed created a still image from the 7-11 footage and showed it to an individual who works at GONL. This individual immediately recognized the suspect as "Oscar", but could not provide a last name. This individual said they were familiar with "Oscar" through multiple previous encounters at GONL. Law enforcement took the first name, as well as the physical characteristics, as seen on surveillance and as relayed through discussions with the witness familiar with Oscar, to narrow down GOMEZ as the suspect in this case.

10. On April 21, 2023, GOMEZ was encountered by ATF Agents as he rode a white bicycle in front of the church. GOMEZ was brought to the OCFD Investigations office and interviewed regarding the fire. GOMEZ agreed to answer questions and signed a written Miranda waiver form.
11. During the interview, GOMEZ admitted to setting the fire. In addition, GOMEZ provided details such as the first item(s) ignited and where the items were placed. This information could have only been known by the arsonist.
12. Based upon the aforementioned facts and circumstances, I believe that probable cause exists that on April 17, 2023, in Oklahoma City, Oklahoma, in the Western District of Oklahoma, **Oscar GOMEZ** damaged and destroyed by fire, a building that was used in and affected interstate commerce, in violation of Title 18, United States Code, Section 844(i).

  
CHAD R. OUBRE  
Special Agent, Bureau of Alcohol, Tobacco, Firearms,  
and Explosives

Sworn and subscribed before me this 23rd day of April 2023.

  
SUZANNE MITCHELL  
United States Magistrate Judge